

# Exhibit A

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*Attorneys for General Motors LLC*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**IN RE: GENERAL MOTORS LLC IGNITION  
SWITCH LITIGATION**

**14-MD-2543 (JMF)**

**DEFENDANT GENERAL MOTORS LLC'S FIRST SET OF REQUESTS  
FOR PRODUCTION TO LEAD COUNSEL FOR PLAINTIFFS**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure ("FRCP") and the Local Rules of the U.S. District Court for the Southern District of New York, Defendant General Motors LLC ("New GM") hereby requests that Lead Counsel for Plaintiffs ("Lead Counsel") respond to the following First Set of Requests for Production within the time prescribed by the Federal Rules of Civil Procedure, and produce the following Documents and things for inspection and copying at the offices of Kirkland & Ellis LLP, 300 North LaSalle Street, Chicago, Illinois 60654, or at such other place as may be agreed upon by the parties.

**DEFINITIONS**

1. The terms "You" and "Your" mean any past or present employee, agent, contractor, consultant, attorney, or person otherwise affiliated with Hagens Berman Sobol Shapiro LLP, Hilliard Muñoz Gonzales LLP, Lieff Cabraser Heimann & Bernstein, LLP, or any other law firm representing individuals in disputes relating to New GM's recalls of vehicles alleged in MDL 2543.

2. The terms “Person,” “Identify,” “Concerning,” “Communication” and “Document” shall have the meanings conferred on them in Local Rule 26.3(c).

3. The words “and” and “or” shall be construed in accordance with Local Rule 26.3(d).

4. The words “any,” “all,” and “each” shall be construed in accordance with Local Rule 26.3(d).

5. Singular and plural words shall be construed in accordance with Local Rule 26.3(d).

6. The past tense of a verb shall be construed to include the present tense and vice versa.

7. The term “MDL 2543 Recalls” means the NHTSA Recalls set forth in the Second Amended Consolidated Complaint (Docket No. 1139).

8. The terms “relate,” “related,” or “relating” to, mean, without limitation, reflecting, identifying, evidencing, describing, discussing, referring to, concerning, constituting, regarding, bearing upon, supporting, summarizing, pertaining to, alluding to, depicting, involving, embodying, containing, mentioning, arising out of, in connection with, or having any logical or factual connection with the matter in question.

9. Top Class Actions, LLC means any past or present employee, agent, contractor, consultant, attorney, professional or person otherwise affiliated with Top Class Actions, LLC.

### **GENERAL INSTRUCTIONS**

1. You are required to search for all Documents and Communications within Your possession, custody, or control, wherever located, including, without limitation, any Documents and Communications placed in storage facilities or in the possession of any other employee, agent, representative, attorney, investigator, or other Person acting or purporting to act on Your

behalf (whether located at his/her residence or place(s) of business), in order to fully respond to these requests.

2. All Documents and Communications that are responsive, in whole or in part, to any of the requests herein shall be produced in full, without abridgement, abbreviation, or expurgation of any sort.

3. If You claim that any Document or Communication responsive to any of the numbered requests below is privileged or immune from discovery as work product, or that any request is unanswerable in full for any reason, You shall respond to the request to the extent to which it is not objected and explain the grounds upon which the objection is based by providing the full identification of the withheld Document or Communication, or portion thereof, including:

- (a) its date;
- (b) the identity of all Persons who prepared, signed, sent, received, and/or were involved with the Document or Communication;
- (c) the general nature of the Document or Communication (e.g., letter, photograph, etc.);
- (d) a summary of its contents or its general subject matter;
- (e) the identities of all Persons to whom the Document or Communication or copies thereof were circulated or its contents communicated; and
- (f) the specific grounds for not responding in full, including the nature of the privilege (e.g., attorney client privilege, work product) or other rule of law relied upon to withhold the Document or Communication, and the facts supporting those grounds.

4. Any purportedly privileged Document or Communication containing non-privileged matter must be produced, with the purportedly privileged portion excised.

5. You shall indicate in Your responses whether any non-privileged, responsive documents are withheld on the basis of any objection in accordance with FRCP 34(b)(2)(C).

6. You shall promptly amend or supplement responses to these requests in accordance with FRCP 26(e).

7. These requests are continuing in nature so as to require further and supplemental responses and/or production by You in the event You obtain or discover additional information, Documents or materials between the time of Your initial responses and/or production and the time of a hearing or trial.

**REQUESTS**

1. Any and all Documents and Communications sent by, received from, or made available to You by Top Class Actions, LLC related to the MDL 2543 Recalls.

2. Any and all Documents and Communications sent by, received from, or made available to You by Top Class Actions, LLC related to the individuals who are presently named plaintiffs in MDL 2543.

3. Any and all Documents and Communications sent by, received from, or made available to You by Top Class Actions, LLC related to the individuals who are no longer named plaintiffs in MDL 2543.

4. Any and all Documents and Communications sent by, received from, or made available to You by Top Class Actions, LLC related to any individuals who submitted information to Top Class Actions, LLC regarding any of the MDL 2543 Recalls but who have not ever been named plaintiffs in MDL 2543.

5. Any and all Documents or Communications related to Lead Counsel's advertisements on [www.topclassactions.com](http://www.topclassactions.com) or any other website or platform owned or operated by Top Class Actions, LLC.

Dated: September 22, 2017

/s/ Richard C. Godfrey, P.C.

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*Attorneys for General Motors LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 22, 2017, the foregoing First Set of Requests for Production was served via email on Lead Counsel for plaintiffs.

/s/ Andrew B. Bloomer, P.C.

Andrew B. Bloomer, P.C.